



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th Street, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

April 26, 2007

Mr. Brian Riggers
FTF IDT Leader,
Lolo National Forest
Building 24, Fort Missoula
Missoula, MT 59804-7297

Re: CEQ 20070098; Frenchtown Face Ecosystem
Restoration Project Draft Supplemental EIS

Dear Mr. Riggers:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the Frenchtown Face Ecosystem Restoration Project in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act.

As indicated following EPA reviews of the earlier DEIS/FEIS, we support the purpose and need of the Frenchtown Face Ecosystem Restoration Project to maintain and improve wildlife habitat and security and water quality and fish habitat; reduce roads while maintaining reasonable access; control noxious weeds; and reduce fire risk and improve fire protection and forest health.

In regard to the additional soils analysis carried out for the DSEIS, we are pleased that an independent Soils Scientist was hired to conduct additional soils analyses to evaluate issues raised by the appellants. We note that the results of the independent soils analysis are summarized in the DSEIS on pages 209 to 213, rather than pages 207 to 211 as stated on page iv of the Summary at the beginning of the DSEIS.

The independent soils analysis states that the proposed actions of decommissioning of 110 miles of road, timber harvest on 3,621 acres and construction of 3.5 miles of temporary roads were evaluated. The two action alternatives in the DSEIS, Alternative 2 and Alternative 5, however, appear to propose somewhat different levels of activities (i.e., decommissioning 76.8 and 114.7 miles of road, respectively for Alternatives 2 and 5; timber harvest on 3,427 and 4,533 acres, respectively; and construction of 5.24 and 5.94 miles of temporary road, respectively (Table 2.3, page 2-36). Modifications made to Alternative 5 in the earlier February 2006 Record of Decision reduced road construction by 2.4 miles and road reconstruction by 2.0 miles, and removed 760 acres of timber harvest to address concerns about old growth, undeveloped areas and fisheries, so that the modified Alternative 5 involved decommissioning of 114.7 miles of road; timber harvest on 3,621 acres, and 3.5 miles of temporary road construction. These

modifications to Alternative 5, however, do not appear to be included in the DSEIS.

This creates some confusion over which Alternative 5 is currently being evaluated in the Supplemental EIS. We recommend that the features of Alternative 5 that are currently being proposed be clarified in the Final Supplemental EIS. The independent soils analysis should identify and evaluate effects of the alternatives currently being considered. We also believe that the modifications to Alternative 5 that were identified in the February 2006 Record of Decision to address concerns about old growth, undeveloped areas and fisheries be carried forward in the FSEIS.

We are pleased that a monitoring plan to evaluate soils effects has been included in the DSEIS with use of fixed photo points and double-ring infiltrometer, bulk density, and resistance to penetration monitoring (pages v and vi of the DSEIS Summary). The mitigation measures for soils identified for application to all harvest units as well as the site specific soil mitigation measures for individual units currently over the 15% detrimental disturbance level (pages v to x of the DSEIS Summary) appear to be protective of soil resources and consistent with the recommendations from the independent soils analysis.

As stated in our earlier comments, while there are potential concerns about short-term impacts to 303(d) listed streams, we believe the proposed road decommissioning and road improvement work and other restoration work associated with the proposed project are likely to result in long-term reductions in sediment production and delivery to streams that will more than compensate for the small amount of sediment production and delivery that may result from proposed timber harvest and prescribed burning activities (i.e., improvements in road drainage & BMPs on 42.4 miles of existing roads; decommissioning of 114.7 miles of road with removal or replacement of 19 culverts; rehabilitation of a placer mining site on ½ mile of Little McCormick Creek; and off-highway vehicle (OHV) education and control of illegal OHV use). We also want to state once again that we appreciate Forest Service involvement in the local Ninemile Watershed Group, and in Ninemile Creek TMDL development and water quality monitoring.

If you have any questions regarding these comments please contact Mr. Steve Potts of my staff in Helena at (406) 457-5022 or in Missoula at 406-329-3313. Thank you for the opportunity to review and provide comments on the DSEIS.

Sincerely,

/s/ John F. Wardell
Director
Montana Office

cc: Larry Svoboda/Julia Johnson, EPA 8EPR-N, Denver
Mark Kelley/Dean Yashan, MDEQ, Helena